

**FILED**  
Clerk  
District Court

**MAR - 4 2008**

**For The Northern Mariana Islands**  
**By** \_\_\_\_\_  
**(Deputy Clerk)**

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Attorney for Defendant Han Nam Corporation

IN THE UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS

ZHAI LAN JIANG,

Plaintiff,

-v-

HAN NAM CORPORATION,

Defendant.

CIVIL ACTION NO. CV-07-0035

DEFENDANT'S RESPONSE TO PLAINTIFF'S  
FIRST REQUEST FOR ADMISSIONS

COMES NOW the defendant Han Nam Corporation to respond to Plaintiff's First Request  
for Admissions as follows:

1. Please admit that YOU had more than 14 and fewer than 101 EMPLOYEES in each  
of 20 or more calendar weeks in 2006.

Response: Admitted

2. Please admit that YOU had more than 14 and fewer than 101 EMPLOYEES in each  
of 20 or more calendar weeks in 2007.

Response: Admitted

3. Please admit that YOU, through YOUR managers, supervisor and/or other  
employees or agents, became aware in April or May 2004 that PLAINTIFF was pregnant.

Response: Denied

